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6 *Attorneys for Defendant Wisdom of the Heart Church*

7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
9 **OAKLAND DIVISION**

10
11 INTERNATIONAL
12 METAPHYSICAL MINISTRY, INC.,
an Arizona corporation,

13 Plaintiff,
vs.

14
15 WISDOM OF THE HEART
16 CHURCH, a California non-profit
company d/b/a THE UNIVERSITY
17 OF METAPHYSICAL SCIENCES;
and various unknown and/or fictional
individuals and entities

18 Defendants.

19 No. 4:21-cv-08066-KAW

20
21 **QUALIFICATIONS AND
EXPERIENCE FOR DEFENDANT'S
EXPERT WITNESS BILL HARTZER**

22
23 **Time: 2:00 P.M**
Date: November 30, 2022
Courtroom: Remote

24
25 Defendant Wisdom of the Heart Church hereby respectfully submits its
Qualifications and Experience for Defendant's Expert Witness Bill Hartzer.

26
27 Mr. Hartzer received a Bachelor of Arts degree in English (with an emphasis
on Professional and Technical Writing) from the University of South Florida in
28 1992. From 1992 to 2001, Mr. Hartzer worked as a technical writer for Fischer

1 International Systems, PageMart Wireless, and Texas Instruments. From 2001 to
2 2005, Mr. Hartzer worked as a technical writer, webmaster, and SEO specialist for
3 Intec Telecom Systems.
4

5 From 2005 to 2008, Mr. Hartzer worked as a search engine marketing
6 manager at MarketNet. In 2004, he founded the Dallas/Fort Worth Search Engine
7 Marketing Association, a group of search engine optimization and search engine
8 marketing industry professionals. Since 2005, Mr. Hartzer has held positions at
9 leading web design firms and digital marketing agencies in the Dallas, Texas area,
10 all focusing on SEO (Search Engine Optimization) and SEM (Search Engine
11 Marketing). SEO focuses on website placement in the search engines' organic or
12 "natural" search engine results, and SEM focuses on managing an advertiser's
13 keyword ads in the search engine results. Advertisers pay "per click" for every click
14 on certain keywords by internet users that brings that internet user to the
15 advertiser's website.
16

17 In 2016, Mr. Hartzer founded his own consulting firm, Hartzer Consulting,
18 LLC. His work focuses on providing highly technical SEO audits of websites to
19 businesses worldwide, as well as providing SEO (search engine optimization) and
20 SEM (search engine marketing) services, such as ongoing monthly marketing
21 services. Mr. Hartzer also provide domain name consulting, acquisition, brokerage,
22 and forensic domain name research services. His clients include operators of
23
24

1 business-to-consumer ("B2C") and business-to-businesses ("B2B") websites,
2 domain name registrars, and domain name registries.

3 In 2020, along with Robert Monster, the CEO of Epik, a domain name
4 registrar, Mr. Hartzer founded DNProtect, a company that provides Domain Name
5 Protection and Stolen Domain Name Recovery Services. He personally provides the
6 stolen domain name recovery services for clients of DNProtect, and he is one of
7 the world's leading experts when it comes to recovering stolen internet domain
8 names. Mr. Hartzer is an expert in forensic internet domain name research, a
9 specialty that he has acquired while helping clients recover their stolen domain
10 names.
11

12 Mr. Hartzer has also published numerous articles, research papers, and case
13 studies on SEO, search engine marketing ("SEM"), and domain names. He has
14 spoken at over 100 conferences on SEO, search engine marketing ("SEM"), and
15 domain names since 2003. Mr. Hartzer has bought and sold hundreds of internet
16 domain names since the late 1990s and actively maintains a portfolio of domain
17 names. Mr. Hartzer has over 25 years of experience in the fields of SEO, SEM,
18 domain name strategy, and online marketing.

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1 Mr. Hartzer's expert witness experience is as follows:

- 2 • Todd Graves Golf School, LLC v. Kirk Alan Junge, D/B/A Single Plane Golf
3 Schools, Civil Action No. 9:21-cv-80793-AMC, United States District Court,
4 Southern District of Florida, West Palm Beach Division — Retained as an
5 expert witness by the Plaintiff, January 2022. Prepared an expert witness
6 report and supplemental report, deposed March 2022.
- 7 • O'Connor Enterprise Group, Inc., DBA EPC Group, v. Kaiser Group
8 Ventures, LLC and Aaron Kaiser, No. 2020-71475, District Court of Harris
9 County Texas, 164th Judicial District - Retained as an expert witness, May
10 2021. Prepared an expert witness report, October 2021.
- 11 • Soter Technologies, LLC v IP Video Corporation, A+ Technology &
12 Security, Inc., & Advance Convergence Group, Inc., Civil Action No. 20-cv-
13 05007-LJL, United States District Court For The Southern District of New
14 York - Retained as an expert witness. May 2021.
- 15 • Paid Search Engine Tools, LLC v. Google Canada Corporation, Google LLC,
16 and Alphabet Inc., Docket Number T-40-18, Ottawa, Ontario, Canada
17 (Federal Court) — Retained as an expert witness, December 2020.
- 18 • St George Executive Shuttle, Inc. v. Western Trails Charters & Tours LLC,
19 d/b/a Salt Lake Express, Civil Action No. 2:17-cv-00900-BCW, United
20 States District Court for the District of Utah Central Division - Retained as

- 1 an expert witness. Prepared an expert witness report, August 2020.
- 2 • Michelle Schilling v. Frank Schilling, Cause Number FAM 227 of 2017,
- 3 Grand Court of the Cayman Islands - Retained as an expert witness. Prepared
- 4 an expert witness affidavit (submitted to the court). Testified in the Grand
- 5 Court of the Cayman Islands, October 2019.
- 6
- 7 • John Hart v. Michael Galantino, John Walker, Case Number 1106, Court of
- 8 Common Pleas of Philadelphia County – Civil Division - Retained as an
- 9 expert witness. Prepared an expert witness report, August 2019.
- 10
- 11 • Opportune, LLP v Oportun, Inc. and Oportun, LLC, Case Number 4:18-CV-
- 12 7, United States District Court for the Southern District of Texas, Houston
- 13 Division - Retained as an expert witness. Prepared an expert witness report,
- 14 provided rebuttal report, deposed, August 2019.
- 15
- 16 • A.B. Cemelle v. Graminex, LLC and Cynthia May, Case Number 03-10291 -
- 17 Retained as an expert witness. Prepared an expert witness report, testified in
- 18 Federal District Court, Detroit, in April 2019. Retained by the Plaintiff, A.B.
- 19 Cernelle.
- 20
- 21 • Modern Imprint, Waltham Massachusetts — upcoming litigation. Retained as
- 22 expert witness in upcoming Online Reputation Management case. Case has
- 23 not been filed yet. Retained by the Plaintiff, Modern Imprint.
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- RGB Plastic, LLC dba Restaurantware v. First Pack LLC dba Pack N Wood Case No. 17-cv-6283. Retained as an expert witness in SE0 and PPC in a website/trademark related case. United States District Court for the Northern District of Illinois, Eastern Division. Retained by the Plaintiff, RGB Plastic, LLC dba Restaurantware.
 - XYZ Media, Inc. v. Mark Mans, Adam Alfia, Michael Terrell, and Lead Crank, LLC — Civil Action No. 3:17-cv-00854-B. Retained as an expert witness in SE0 and lead generation case. United States District Court for the Northern District of Texas. Retained by the Defendant.
 - Christopher Hamilton v. Summa Consulting — Case 37-2014-00011235-CU-FR-CTL — Retained as SE0 and Domain Name expert witness. Superior Court of the State of California for the County of San Diego. Retained by the Defendants.
 - Brightedge Technologies, Inc. V. Searchmetrics GMBH and Searchmetrics Inc. — Case 3:14-cv-01009 WHO — Retained as an SEO expert witness.

DATED: 10/14/2022

Respectfully submitted,
VALERIE F. HORN & ASSOCIATES, APLC

BY: /s/ Valerie F. Horn, Esq.
Valerie F. Horn

EXHIBIT “A”

Bill Hartzer
Bill@BillHartzer.com
www.Hartzer.com
214-236-4378

Executive Summary of Qualifications

Senior Digital Marketing Executive and SEO (Search Engine Optimization) Professional with over 20 years of proven search engine optimization and internet marketing experience, 8 years of social media marketing experience, 3 years of experience as a SEO, Domain Name, and Online Reputation Management Expert Witness. Proven ability to lead a team of digital marketing professionals & sales staff, and run a profitable digital marketing agency. Proven ability to develop search engine marketing and social media marketing strategies and implement them successfully using search engine optimization best practices. Named one of the top 100 most influential Internet Marketers of 2008 and 2009, and one of the top 20 marketers in Dallas in 2014. Professional strengths include:

- Digital Marketing Strategy
- Search Engine Marketing Strategy
- Search Engine Optimization
- Social Media Marketing
- SEO Audits
- Link Audits
- Website Content Creation
- SEO Expert Witness
- Google Ads Certified Individual
- Domain Name Strategy
- Website Analytics
- Content Creation & Copywriting
- Keyword Research
- Competitive Analysis
- Social Media Advertising Management, Including Facebook and Twitter ads
- Domain Name Expert Witness
- Online Reputation Management Expert Witness

EMPLOYMENT HISTORY

Hartzer Consulting, www.Hartzer.com
SEO Consultant, Domain Name Consultant

December, 2016 to Present

Search Engine Optimization Consultant, providing highly technical SEO audits for websites. Through my consultancy, I provide monthly ongoing SEO, link audits and cleanup services, social media marketing, paid search management, and digital marketing strategy for clients, worldwide. I also provide search engine optimization services such as keyword research, link building, SEO audits, and other SEO implementation tasks for SEO agencies on an hourly basis.

SEO and Digital Marketing agencies outsource their SEO work to me on a regular basis, hiring me for their most difficult projects.

I provide expert witness services for litigation, as well as litigation support for Search Engine Optimization and Domain Name cases. I've been retained on cases including SEO, domain names, and domain name valuations. I have provided expert witness reports related to SEO and domain names in Federal court. List of cases available upon request.

DNProtect, www.DNProtect.com
Director and Co-Founder

February, 2020 to Present

Director and Co-Founder of DNProtect, the leading risk management service for internet domain names. I created the algorithm behind DNP Score, which is a type of risk scoring system for domain names. I manage and run the service, maintain the DNP Score algorithm, and assist in the recovery of stolen domain names. DNProtect also provides Domain Name Protection services.

Verified Domains, Verified.Domains
Co-Owner, Inventor, Addison, Texas

June, 2014 to January 2019

I invented and was co-owner of a patent-pending service that provides complete background checks for domain names. The service included a 150-point check to ensure that a domain name is clear and does not have any problems that would prohibit it from being used in the future for a website. Many domain names have been used in the past and some have a bad history, including search engine spam, ownership issues, email spam issues, and a history of hosting malware. Verified Domains was the first-ever and only complete background check that is similar to a vehicle history report for cars and trucks. The service offered up to a \$50,000 guarantee.

Advice Interactive, AdviceInteractiveGroup.com
Senior Vice President, Agency Services, McKinney, Texas

May, 2016 to December 2016

Ran a successful, profitable, digital marketing agency. Reporting directly to the CEO and CFO of the parent company, I was responsible for all daily operations of the agency, which provided digital marketing, search engine optimization, search engine marketing, content marketing & research, and web design & development services. Client base included 45+ clients, including retail and reseller (wholesale) accounts. Managed staff of 40+ employees and contractors across five different departments, located in 3 different countries.

Globe Runner, GlobeRunner.com
Senior Strategist, Addison, Texas

November, 2013 to May 2016

Implemented search engine optimization campaigns for clients. Performed full technical SEO Audits and Link Audits on client websites. Performed domain name research on New gTLD domain names and wrote white papers and case studies that reported the results. Created and launched the Verified.Domains service, the first-ever comprehensive background check for domain names. Featured speaker and keynote speaker on SEO and domain name issues at conferences worldwide, including search marketing and ICANN meetings.

Standing Dog Interactive, StandingDog.com (wPromote.com)
Director of Search Engine Optimization, Dallas, Texas

June, 2010 to Oct., 2013

Managed and implemented search engine optimization campaigns for clients. Performed full technical SEO Audits and Link Audits on client websites. Built the SEO Department from a team of 5 SEO Specialists to a team of 16, including SEO Specialists, SEO Managers, and Technical SEOs. Trained all new SEO employees on SEO processes and procedures, and trained all new company employees on SEO 101 issues. Focused on organic search engine optimization, link acquisition, blogger outreach, and highly technical SEO & Link Audits that included near-term and future SEO strategies and recommendations.

Accomplishments

- Designed, documented and implemented companywide search engine optimization processes and procedures.
- Set up training program for new SEO Department employees.
- Configured and managed 20+ cloud servers for use by SEO Department employees.
- Grew SEO client base from 200+ clients to 1000+ monthly (and annual) retainer clients in 3 years.
- Achieved Results: Improved clients' overall online visibility, increased clients' search engine rankings.
- Performed technical Link Audits of client websites, cleaning up subpar work done by other SEO firms.

Utilized SEO best practices to achieve top 10 search engine rankings for clients in the competitive travel and hospitality industry, as well as other competitive industries.

Vizion Interactive, VizionInteractive.com
Search Engine Marketing Manager, Irving, Texas

February, 2008 to February, 2010

Managed and implemented SEO search and SEM campaigns for clients. Performed full SEO Audits on client websites. Wrote and promoted client blogs as a ghost writer, on a systematic basis. Set up and managed clients' social media accounts. Focused on organic search engine optimization, link acquisition and link optimization, content creation, and social media marketing.

Accomplishments

- Designed, documented and implemented companywide SEO and SEM processes.
- Researched and recommended Project Management System
- Result: Vizion quadrupled its client base within 12 months.
- Wrote blog posts and articles for clients that frequently went viral on social media networks.
- Results: Improved online visibility, increased the number of links to websites, and optimized search engine rankings.
- Utilized SEO best practices to achieve top 10 search engine rankings for clients in very competitive markets.

MarketNet, MarketNet.com
Search Engine Marketing Manager, Dallas, Texas

September, 2005 to February, 2008

MarketNet was a leading Web Design firm based in the Dallas, Texas area. Hired as practice manager to develop Search Engine Marketing Service offering. Developed PPC (Pay Per Click), organic SEO, SEM and SEM training as service offerings.

Accomplishments

- Established the search engine marketing service offering for the company
- Lead SEO, SEM, PPC and SEM training consultant for all clients.
- Hired, cross-trained and managed two other SEO specialists
- Managed PPC campaigns on Google AdWords and Yahoo! Search Marketing for clients, some with over 500,000 keywords
- Frequently reduced clients' Pay Per Click (PPC) annual ad spend by improving their organic, natural search engine rankings.
- One client reduced their annual spend from \$180,000 per year to less than \$2000 per year because of better organic rankings.

February, 2001 to September, 2005

Intec Telecom Systems

Search Engine Optimization Specialist and Webmaster, Dallas, Texas

Intec Telecom Systems was an international telecommunications software company.

Responsibilities: Webmaster and SEO for company website, as well as over 20 product websites, including CarrierAccessBilling.com

Accomplishments

- Increased website traffic via top search engine rankings at search engines.
- Top search rankings were responsible for producing leads & inquiries that produced millions of dollars of sales annually.
- Editor, Webmaster, and Website Designer of the internal company intranet website
- Administrator and Moderator for Intec Telecom Systems' customer forum/message board

Non-Profit Industry Organization

Dallas/Fort Worth Texas Search Engine Marketing Association www.DFWSEM.org

Founder

January, 2004 to Present

- D/FW Search Engine Marketing industry trade group
- Founded the organization, personally inviting the original members to participate
- Host, designed, and currently maintain the organization's website and other duties, as needed.
- Current board member of DFWSEM, helping organize the annual State of Search conference.

Skills

- Public Speaking: frequent sought-after speaker at search marketing industry conferences including:
 - Pubcon (Austin, Boston, Dallas, Las Vegas, New Orleans conferences)
 - Search Engine Strategies and SMX (Toronto, New York, San Jose, Chicago conferences)
 - State of Search conferences, Dallas, Texas
 - Rocks Digital Marketing conference, Addison, Texas
 - NamesCon conferences, Las Vegas, Nevada
 - Digital Summit conferences (Washington, D.C., Raleigh, North Carolina)
 - ClickZ Marketing Conferences, Toronto, Canada
 - Keynote address at domain name conference in Beijing, China
 - Invited guest speaker at Domain Name industry association events, held at ICANN meetings worldwide
- Over 20 years of search engine optimization experience.
- United States Brand Ambassador, Majestic.com
- United States Brand Ambassador, OnCrawl.com
- Expert Witness, various legal and court cases involving Search Engine Optimization, Domain Names, and Social Media.

EDUCATION**University of South Florida**, Tampa, Florida

Bachelor of Arts Degree

English Major (Professional and Technical Writing emphasis)

Writing samples, references, and litigation experience available upon request.

Bill Hartzer
Bill@BillHartzer.com
www.Hartzer.com
214-236-4378

Expert Witness Experience

Todd Graves Golf School, LLC v. Kirk Alan Junge, D/B/A Single Plane Golf Schools, Civil Action No. 9:21-cv-80793-AMC, United States District Court, Southern District of Florida, West Palm Beach Division – Retained as an expert witness by the Plaintiff, January 2022. Prepared an expert witness report and supplemental report, deposed March 2022.

O'Connor Enterprise Group, Inc., DBA EPC Group, v. Kaiser Group Ventures, LLC and Aaron Kaiser, No. 2020-71475, District Court of Harris County Texas, 164th Judicial District - Retained as an expert witness by the Plaintiff, May 2021. Prepared an expert witness report, October 2021.

Soter Technologies, LLC v IP Video Corporation, A+ Technology & Security, Inc., & Advance Convergence Group, Inc., Civil Action No. 20-cv-05007-LJL, United States District Court For The Southern District of New York - Retained as an expert witness by the Plaintiff. May 2021.

Paid Search Engine Tools, LLC v. Google Canada Corporation, Google LLC, and Alphabet Inc., Docket Number T-40-18, Ottawa, Ontario, Canada (Federal Court) – Retained as an expert witness by the Plaintiff, December 2020.

St George Executive Shuttle, Inc. v. Western Trails Charters & Tours LLC, d/b/a Salt Lake Express, Civil Action No. 2:17-cv-00900-BCW, United States District Court for the District of Utah Central Division - Retained as an expert witness by the Plaintiff. Prepared an expert witness report, August 2020.

Michelle Schilling v. Frank Schilling, Cause Number FAM 227 of 2017, Grand Court of the Cayman Islands - Retained as an expert witness by the Plaintiff. Prepared an expert witness affidavit (submitted to the court). Testified in the Grand Court of the Cayman Islands, October 2019.

John Hart v. Michael Galantino, John Walker, Case Number 1106, Court of Common Pleas of Philadelphia County - Civil Division - Retained as an expert witness by the Plaintiff. Prepared an expert witness report, August 2019.

Opportune, LLP v Oportun, Inc. and Oportun, LLC, Case Number 4:18-CV-7, United States District Court for the Southern District of Texas, Houston Division - Retained as an expert witness by the Defendant. Prepared an expert witness report, provided rebuttal report, deposed, August 2019.

A.B. Cernelle v. Graminex, LLC and Cynthia May, Case Number 03-10291 - Retained as an expert witness. Prepared an expert witness report, testified in Federal District Court, Detroit, in April 2019. Retained by the Plaintiff, A.B. Cernelle.

New England Based Marketing Company – Retained as expert witness in upcoming Online Reputation Management case. Case has not been filed yet. Retained by the Plaintiff in 2019.

RGB Plastic, LLC dba Restaurantware v. First Pack LLC dba Pack N Wood, Case No. 17-cv-6283. Retained as an expert witness by the Plaintiff. United States District Court for the Northern District of Illinois, Eastern Division. Retained by the Plaintiff, RGB Plastic, LLC dba Restaurantware.

XYZ Media, Inc. v. Mark Maris, Adam Alfia, Michael Terrell, and Lead Crank, LLC – Civil Action No. 3:17-cv-00854-B. Retained as an expert witness in SEO and lead generation case by one of the Defendants. United States District Court for the Northern District of Texas. Retained by the Defendant.

Christopher Hamilton v. Summa Consulting – Case 37-2014-00011235-CU-FR-CTL – Retained as SEO and Domain Name expert witness. Superior Court of the State of California for the County of San Diego. Retained by the Defendants.

Brightedge Technologies, Inc. V. Searchmetrics GMBH and Searchmetrics, Inc. – Case 3:14-cv-01009 WHO – Retained as an SEO expert witness by the Plaintiff, June 2017. US District Court for the California Northern District.

1
2 **CERTIFICATE OF SERVICE**
3

4 I HEREBY CERTIFY that on October 14, 2022, a true and correct copy of
5 **QUALIFICATIONS AND EXPERIENCE FOR DEFENDANT'S EXPERT**
6 **WITNESS BILL HARTZER** was served via electronic mail on counsel for the
7 Plaintiff:

8 Christopher M. Goodman, Esq.
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11 Phoenix, AZ 85003
12 Telephone: (602) 253-1000
13 chris@goodmanlegal.com
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17 Beverly Hills, CA 90211
18 Telephone: (310) 928-7885
19 Fax: (480) 421-1002
20 ebh@kfcfirm.com



22 **FEDERAL:** I declare, under penalty of perjury under the laws of the United
23 States of America that the foregoing is true and that I am employed in the
24 office of a member of the Bar of this Court at whose direction the service was
25 made.

26 Executed on October 14, 2022, at Los Angeles, California.

27 _____
28 /s/ Valerie F. Horn

29 Valerie F. Horn